

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

BOLLENBACH ENTERPRISES LIMITED
PARTNERSHIP,
on behalf of itself and all others similarly
situated,

Plaintiff,

vs.

OKLAHOMA ENERGY ACQUISITIONS
LP; ALTA MESA SERVICES, LP; and
ALTA MESA HOLDINGS, LP
(including affiliated predecessors and
affiliated successors),

Defendants.

Case No. 5:17-CV-00134-HE

**CLASS REPRESENTATIVE'S MOTION FOR APPROVAL OF ATTORNEYS'
FEES, EXPENSES, CLASS REPRESENTATIVE AWARD, AND SETTLEMENT
ADMINISTRATION EXPENSES**

Plaintiff, as Class Representative for the Settlement Class, respectfully files this Motion for Approval of Attorneys' Fees, Expenses, Class Representative Award, and Settlement Administration Expenses, and hereby moves this Court for entry of an Order approving the following, in accord with the parties' Amended Settlement Agreement and Section IV of the Class Notice, Doc. 40-1, at ECF 5: Attorneys' Fees in the amount of \$1,577,343.00; Litigation expenses in the amount of \$48,978.03; Class Representative Award in the amount of \$70,980.44; and Settlement Administration expenses in the amount of \$31,000.00, *plus* the ability to recover additional expenses of up to \$8,000.00 through the completion of the distribution of the Settlement Proceeds and in the event of an appeal, to the extent such expenses are actually incurred. Accordingly, Class Representative seeks

reservation of \$39,000.00 from the Settlement Proceeds to pay future Administration Expenses and Litigation Expenses related to completion of the distribution of Settlement Proceeds and any future appeal.

Class Representative bases this Motion on:

Memorandum of Law in Support of this Motion and exhibits thereto:	
Exhibit 1	Joint Declaration of Class Counsel in Support of Motion for Approval of Attorneys' Fees, Expenses, Class Representative Award, and Settlement Administration Expenses
A	Firm Bio – Rex A. Sharp, P.A.
B	Firm Bio – The Lanier Law Firm, P.C.
C	Declaration of Layn R. Phillips in <i>Hitch Enterprises, Inc. et al v. Cimarex Energy Co. et al</i> , No. CIV-11-13 (W.D. Okla.)
D	Declaration of Michael Burrage in <i>Dorsey J. Reirdon v. XTO Energy, Inc.</i> , No. 16-cv-00087 (E.D. Okla.)
E	Declaration of Steven S. Gensler in <i>Dorsey J. Reirdon v. XTO Energy, Inc.</i> , No. 16-cv-00087 (E.D. Okla.)
F	Order Awarding Attorneys' Fees, Litigation Expenses and Case Contribution Award in <i>Chieftain Royalty Company v. Laredo Petroleum, Inc.</i> , No. CIV-12-1319 (W.D. Okla. May 13, 2015)
G	Declaration of Kimberly Hamilton, <i>Freebird, Inc. v. Merit Energy, Inc.</i> , No. 10-1154-KHV-JPO (D. Kan. Jan. 15, 2013) (Docket No. 199-3)
H	Table of Oklahoma Cases Awarding 40% Contingent Fee
Exhibit 2	Expert Declaration of Daniel T. Reineke
Exhibit 3	Declaration of Mediator Robert G. Gum
Exhibit 4	Declaration of Melvin Bollenbach
The applicable law, all pleadings, declarations, and records on file in this matter, which are respectfully incorporated by reference as if fully set forth herein.	

In the event no objection to this motion is filed, also attached as Exhibit 5 is a proposed order granting the requested relief.

Accordingly, Class Representative respectfully requests the Court enter an Order granting the relief stated above and granting any further and proper relief.

Respectfully Submitted,

/s/ Rex A. Sharp
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CLASS COUNSEL

CERTIFICATE OF SERVICE

I hereby certify that on the 6th day of February 2018, a true and correct copy of the foregoing document was delivered via the ECF system to the following counsel of record:

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/s/ Rex A. Sharp
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